

John Dellaportas

From: Andrew R. Kurland <AKurland@kasowitz.com>
Sent: Sunday, June 28, 2020 12:24 PM
To: 'Geron, Yann'; John Dellaportas; Beth Khinchuk; Michael Paul Bowen; Rocco A. Cavaliere
Cc: Thomas A. Pitta; 'Frank Oswald'; Jared Borriello; Litos, Jeannette; Eric D. Herschmann; Santucci, Nicole N.
Subject: RE: Genger--Sagi's deposition date and time

As stated previously, KBT does not agree that there will be only one deposition of Sagi Genger and TPR Investment Associates, Inc. Those depositions were noticed by us (and others) separately, and we are treating them separately.

From: Geron, Yann [mailto:ygeron@reitlerlaw.com]
Sent: Sunday, June 28, 2020 7:12 AM
To: John Dellaportas <JDellaportas@EMMETMARVIN.COM>; Andrew R. Kurland <AKurland@kasowitz.com>; Beth Khinchuk <BKHINCHUK@EMMETMARVIN.COM>; Michael Paul Bowen <MBowen@kasowitz.com>; Rocco A. Cavaliere <rcavaliere@tarterkrinsky.com>
Cc: Thomas A. Pitta <TPITTA@EMMETMARVIN.COM>; 'Frank Oswald' <frankoswald@teamtogut.com>; Jared Borriello <jborriello@teamtogut.com>; Litos, Jeannette <Jlitos@reitlerlaw.com>; Eric D. Herschmann <EHerschmann@kasowitz.com>; Santucci, Nicole N. <nsantucci@reitlerlaw.com>
Subject: Genger--Sagi's deposition date and time

Late on Friday, we received a link from Mr. Dellaportas comprising the purported document production from Sagi and Dalia. Leaving aside whether that production is responsive or adequate, we need to confirm the date and time for Sagi's deposition. The date originally discussed (and I believe agreed) was June 30 for 7 hours of testimony. However, the Court has set a discovery conference on June 30, 2020, starting at 3:00 p.m. Eastern, which will not allow us to complete Sagi's deposition on that date. Therefore, I am looking to confirm with the parties that (i) Sagi's deposition will be conducted on June 30, 2020, between 9:00 a.m. and 2:45 p.m. Eastern, and (ii) will be continued on July 1, 2020, starting at 9:00 a.m. Please advise.

Also, Judge Garrity directed the parties to come up with a consensual revised schedule on the motion to dismiss in light of the multiple pending discovery issues. Other than Mr. Cavaliere's email and Mr. Pitta's response, I do not believe I saw any suggested dates from anyone. I believe Judge Garrity expects us to appear on June 30th with a consensual revised schedule. Please provide some proposed dates.

Yann

Yann Geron
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